

Daniel Maccarone
Glyco Force

May 31, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
600 Pennsylvania Avenue, NW
Washington, DC 20580
RE: Business Opportunity Rule, R511993

<https://secure.commentworks.com/ftc-bizopNPR/>

Dear Sir or Madam:

I am writing this letter because I am very much concerned about the proposed Business Opportunity Rule R511993. I believe that it could prevent me from continuing as a Mannatech Distributor, and thus causing extreme financial hardship for me, my family, and at least ten of my associates that count on their monthly checks from Mannatech. I understand that the FTC's responsibilities are to protect the public from unfair and deceptive business practices, but some of the sections in the proposed rule will make it impossible for me to sell Mannatech products in a profitable fashion.

The seven day waiting period to enroll new Distributors is one of the most confusing and burdensome sections of the proposed rule. A Mannatech sales kit only costs \$99 and comes with \$99 worth consumable product. People spend much more than this on products such as TVs, household items, cars, boats, furniture, and they do not have to wait seven-days. This waiting period gives the impression that there might be something wrong with the plan. Mannatech has a 90% buyback policy for all products including sales kits purchased by a salesperson within the last twelve months.

The proposed rule also calls for the release of any information regarding lawsuits involving misrepresentation, or unfair or deceptive practices even if the company was found innocent. Nowadays, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless Mannatech is found guilty. This rule would put Mannatech and I at an unfair disadvantage even though Mannatech has done nothing wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I often provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. Also, giving away this information could damage the business relationship of the references who may be involved in other companies or businesses including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to Mannatech headquarters and then wait for the list. I also think the following sentence required by the

proposed rule will prevent many people from wanting to sign up as a salesperson “If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers.” People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met.

I have been a Mannatech Distributor for 21 months. I originally became a distributor with Mannatech to use the products and get a discount. However when I saw the benefits of the products I started selling it to friends and family. Now my family depends on this as a fulltime source of income. I have over 500 satisfied distributors and customers and I can honestly say that I have never had one complaint about the way Mannatech does business.

I appreciate the work of the FTC to protect consumers, but I believe this proposed new rule has many unintended consequences and that if passed this rule would put thousands of American families into bankruptcy including mine.

Thank you for your time in considering my comments.

Sincerely,

Daniel Maccarone